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September 30, 2022

## By ECF

The Honorable Vincent L. Briccetti **United States District Court** Southern District of New York 300 Quarropas Street White Plains, NY 10601-4150

> Re: In re: HBL SNF, LLC, Case No. 22-cv-06254 (VB)

Dear Judge Briccetti:

We write jointly on behalf of all parties to the appeal to provide a status report. As previously reported to this Court, the parties have reached a global settlement in principle of all issues in the case subject to final documentation. Consistent with our prior status report, a plan of reorganization premised on this global settlement was filed by the debtor with the Bankruptcy Court on August 29, 2022. The purchase and sale agreement that is an integral part of the overall settlement has not yet been finalized and is still the subject of negotiation. The parties expect to complete those negotiations and to then seek confirmation of the bankruptcy plan at a hearing currently scheduled for November 9, 2022.

We respectfully request that the appeal be stayed until after the November 9, 2022 hearing date before the Bankruptcy Court on plan confirmation.

Respectfully yours,

John Giardino

cc: Counsel of Record (by ECF and email)